



TE RŪNANGA O  
**TOA RANGATIRA**

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Submission No:

161

The logo of Kāpiti Coast District Council, featuring a stylized white figure holding a spear and a shield, set against a red circular background.  
**Kāpiti Coast**  
DISTRICT COUNCIL  
Whakarua Whakamua Te Taiao Whakamua

## Ā UPANE KA UPANE WHITI TE RA

19 Hepetama 2022

Jason Holland

District Planning Manager

Kāpiti Coast District Council

175 Rimu Road,

Paraparaumu 5254

Tēnā koe Jason,

### **Proposed Plan Change 2 – Intensification**

To [Kāpiti Coast District Council]

**Name of Submitter:** [Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira]

This is a submission on the following proposed plan change:

### **[Proposed Plan Change 2-Intensification]**

The specific provisions of the Proposal that our submission relates to are:

- **Proposed amendments to the District Objectives Chapter**
- **Proposed amendments to the Urban Form and Development Chapter**
- **Proposed new Papakāinga Chapter**
- **Proposed amendments to the General Residential Zone**
- **Proposed amendments to the Metropolitan City Zone**
- **Proposed amendments to the Town Centre Zone**
- **Proposed amendments to the Local Centre Zone**
- **Proposed amendments to the General Rural Zone**
- **Proposed amendments to the Financial Contributions Chapter**
- **Other proposed consequential or supporting amendments**
- **Proposed amendments to the District Plan Schedules**
- **Proposed amendments to the Definitions Chapter**



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My general submission points are:

- Support the inclusion of a Papakāinga chapter and its definitions,
- Partially support the overall implementation of intensification,
- Partially support the inclusion of coastal area qualifying precinct,
- Oppose proposed amendments around the removal of character and amenity values,
- Oppose intensification zoning over Sites and Areas of Significance to iwi and Māori,
- Oppose infrastructure is not a qualifying matter in the Proposed Plan Change,
- Oppose Taiao and its wellbeing is not considered as part of overall wellbeing,
- Tangata Whenua is not provided for in provisions of residential intensification,
- Tangata Whenua land development aspirations are not provided,
- There should not be financial contributions for reducing mauri of our taiao,

Our submission on specific points in the Plan Change 2 are below.

Te Rūnanga o Toa Rangatira (the Rūnanga) seeks the following decisions from the local authority:

**DO-O3 Development Management:**

Plan Change 2 proposes to amend the objective DO-O3 Development Management. We **oppose this amendment** because whilst the Objective is amended to say: *...and to provide for the development of new urban areas where these can be efficiently serviced and integrated with existing townships, delivering...* Clauses 1-10 do not refer to securing *available three waters infrastructure* and assumes that *planned infrastructure* could provide for the management of expected development. This means that development proposals will be provided for in the absence of such infrastructure.

We **oppose Clause 6** on the basis it is now written in a manner that waters down character and amenity values which further waters down the inherent cultural and indigenous components of these special values. *Giving regard to* is passive instead of maintaining and enhancing. In the absence of strong evidence, the Rūnanga is concerned that the protection of these values can be diminished by *giving regard to* instead of maintaining and/or enhancing.

We **oppose the Clause 10** for having a policy intention that diminishes the Council's role in responding to Climate Change. We suggest instead of Council *'supporting reductions'*, the land use *should reduce* the emissions by way of introducing Standards in the Plan.

**"Local issues" section of the explanatory text to Objective DO-O3:**

The Rūnanga is concerned whilst the amended parts of the *Local Issues Section* do acknowledge the district plan should *enable more people to live in Kāpiti where these are well*



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*connected to transport, infrastructure, commercial activities and community services*, it does not acknowledge these are not available and match the development levels NPS-UD is seeking. The section could be rewritten to ensure that *more people can only live in Kāpiti if there is adequate infrastructure and transport*. It is within our existing knowledge that the region is not yet well-connected to infrastructure and transport.

The Rūnanga is concerned that the proposed amendments removed the word 'preservation' and replaced it with 'recognition'. There is not enough evidence to water down the protection vested in the Operative Plan. Since one does suggest 'active action' and the other encourages 'doing nothing', it is concerning a planning problem is removed without contemplating the resource management issue at hand.

#### **New Objective DO-Ox1 Well-functioning Urban Environments:**

We **oppose** the wording of this new Objective because it is fundamentally flawed. The new wording does not speak **to environmental wellbeing**, whereas all the other wellbeings mentioned in the Objective social, economic and cultural wellbeing cannot exist without the environmental wellbeing, *te oranga mō te taiao* (the wellbeing of the environment). . Amend to add *environmental wellbeing* and / or amend objective to reflect the environmental wellbeing.

#### **New Objective DO-Ox2 Housing Variety and Choice:**

We partially support this objective as it somewhat fails to recognise that *the housing variety and choice are limited even more so for iwi and members of Tangata Whenua, and that housing choice and variety do not reflect the housing aspirations of Tangata Whenua*. The objective should be rewritten to reflect this and where in the Plan this Objective will be given effect to, should also be specified. **1.8. should also include Papakāinga chapter and the zones that it applies to.**

#### **New Objective DO-Ox3 Residential Intensification Precincts:**

DO-Ox3 purely gives effect to increased height and density within the parts of the General Residential Zone but fails to speak and link into Papakāinga and Tangata Whenua aspirations into the future. It does not account for the impacts on the Sites and Areas of Significance to Māori. We oppose the current drafting of the new objective.

This objection includes the objective being unable to cater for changing land use for Tangata Whenua when they receive land back through Settlement arrangements; the objective will be simply overtaking the rights and interests of Tangata Whenua by overlaying a 'residential intensification precinct' without Tangata Whenua involvement. In addition to amending this objective to ensure Tangata Whenua's role in the residential intensification precinct, 1.10 should also include Papakāinga.



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### **DO-O11 Character and Amenity:**

This Objective is amended in the proposed change and now provides a watered down version of the values proposed to be protected in the first place. The phrases of character and amenity are muddled through although they represent different values in urban environment.

We oppose that they won't be *maintained and enhanced* but *just recognised*. Character and amenity values have significant cultural and indigenous components, but they are not referenced in clauses 1-5. For instance, presence of mature vegetation can also be a cultural heritage.

### **Amendments to explanatory text to objective DO-O11:**

We oppose the explanatory text regarding the 'character of development' having no reference to indigenous whakapapa and natural features as identities of Tangata Whenua, such as the Tararua Ranges. Places and spaces mentioned in this explanatory text are not communicated how significant they are for Tangata Whenua.

This means that their significance is reduced to visible values from Pākehā perspectives and constructs. This section should be rewritten with Tangata Whenua.

The explanatory text gives effect to Objective 4 of the National Policy Statement on Urban Development 2020 by emphasizing that the '*amenity values develop and change over time*'. We oppose this reduced and unsubstantiated perspective taken at amending this section when we know amenity covers many different dimensions of cultural and indigenous identities which come from the past.

The demonstration of Tangata Whenua issues is troublesome with the language used in this section, such as, using the word *acknowledging* instead of *maintaining*, given that the plan change has not provided in depth analysis of Sites and Areas of significance to Māori and iwi. It is a bold proposal in the absence of these assessments, to downgrade the iwi-related values from maintaining to acknowledging.

In the same regard, we observe there are phrasing used to downscaling the importance of amenity and character such as instead of '*avoiding a change in scale*' to '*managing the change in scale of development*'. There are no mentions of Otaihanga, Waikanae, Te Horo and Peka Peka - how Tangata Whenua define these places. The Rūnanga opposes the language used around '*Managing the change in existing character that may result from development*' given this language ignores the multi-faceted character and amenity in the absence of robust evidence.

It is concerning, that it is acknowledged '*while a lack of reticulated infrastructure may constrain levels of development in the short-term, access to reticulated infrastructure to support existing and new development in the area may need to be considered over the long term*'. This should not be a 'may' but 'must' as we are aware the three waters infrastructure is not fit for this purpose.



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### **Objective DO-O16:**

We oppose the wording of this objective that whilst it was amended to cater for *‘providing for higher density urban built character and high-quality development in Metropolitan and town centre zones’* we are not assured that the environmental quality is provided for. Objective DO-O16 Centres should include an objective that the environment is provided for as part of the proposals and the environment must not be worse off.

### **The explanatory text to Objective DO-O16:**

We understand that there was not a co-design of “the centres hierarchy” with Tangata Whenua iwi and hāpu for the Kāpiti’s Operative District Plan. Centres hierarchy could impact on Tangata Whenua’s whenua aspirations and bringing these aspirations into fruition by way of dictating the densities and heights at sites that are not appropriate. We do not desire this to be used as a barrier for Tangata Whenua to develop their own housing and land development aspirations (for instance, papakāinga, education etc.) or implement and express their cultural practices. We certainly would not be keen to see centres hierarchy being used in a way that puts a barrier in front of implementing Tino Rangatiratanga.

Amended text *‘...to support the role of each centre, the scale and urban built form of development provided for within each of the centres is related to the centre’s position within the hierarchy...’* suggests that high density and medium density provisions that enable development in the Centres hierarchy are supported within that hierarchy. Given the up zoning of certain areas in Kāpiti, such as Paekākāriki, it seems this hierarchy will change over time visually and physically; the explanatory text does not reflect the change itself will impact on the Hierarchy.

Another point that emanates from how centres hierarchy will stack up to evidence is that it seems it is left to Council’s discretion how they arrange the centres sit in this hierarchy, in the shadow of the housing intensity and density rules and implementation. One might argue that the way that walking catchments are calculated is a good example and demonstrates the arbitrariness of the selection process where with some areas, we are seeing what is proposed is already breaching that hierarchy. Paekākāriki is a good example.

### **Papakāinga objectives:**

We support the Papakāinga objectives. We encourage papakāinga being enabled in the Metropolitan City Zone.

In the definition of ‘ancestral land’ we would like this to be amended to a more enriched version from the current proposed:

*"Ancestral Land means land where tangata whenua have an undisturbed collective whakapapa relationship."*



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### Proposed Amendments to the Urban Form and Development Chapter

#### New Policy UFD-Px Urban Built Form:

The “urban form” is used to describe a **city’s physical characteristics**. It refers to the size, shape, and configuration of an urban area or its parts. The Rūnanga would like this to be amended to reflect Tangata Whenua visibility, influence, and presence, of how developments look and feel.

*Urban built form* is a Pākeha construct, and it should not mean just height and density; this is a narrow way of describing urban built form. This chapter only refers to and focuses on heights and densities in certain zones. The urban built form policy should be amended to say whether the height and densities deliver for existing and historical development patterns, appearance and sites of significance, degree of enclosure to the street exhibit (relationship with the building height and street width), public realm being activated, pedestrian activity, significant landmarks and gateways for cultural purposes and how they are presented.

We do support the usage of language ‘avoiding’ inappropriate heights and densities within sites of significance which is a qualifying matter.

#### Policy UFD-P1 Growth Management:

This policy is now crafted and amended in a way that it reads to be at odds with what it is trying to achieve. While the clause 4 tells us to *‘avoid urban expansion that would compromise the distinctiveness of existing settlements and unique character values in the rural environment between and around settlements’*, it seems to be fine (and hence inconsistent), on the other hand ‘manage’ character and amenity in the face of heights and densities in the urban zones.

If infrastructure is a barrier, it is a barrier for suggested, promoted, and encouraged density and heights of housing development as well. Clauses 5 and 6 need to be stronger to mean that strategic infrastructure should be available and housing development should not just promote the efficient use of energy and water, it should be energy and water efficient.

#### Policy UFD-P2 Housing Choice:

This policy should emphasize the impact of Climate Change and housing affordability. As housing affordability and particularly the housing market defines the housing choice, we will see more sprawl between the regions and cities.

Housing choice policy should, therefore, specify that *housing choices will be carefully considered as per their impact on Climate Change in our region and applications will be assessed on this merit.*





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We are concerned that dropping a level down of the ‘amenity values’ should not be necessarily the victim of the housing problems. District Plan still needs to deliver for the amenity values regardless of accommodating different housing choices. We are in essence in support of District Plan catering for different layers of housing choices, but this should not be done in a way that deteriorates Amenity Values.

### **Policy UFD-P3 Managing Intensification:**

We are concerned that residential intensification will ‘only’ give consideration to the effects of subdivision and development on character and amenity values. We are concerned some of these values have embedded cultural components and are part of sites and areas of significance and culturally sensitive areas.

In this instance, ‘giving consideration’ is not good enough. This Policy should be recrafted to say: *residential intensification will give special regard to significant impacts of the subdivision and development on character and amenity especially when it interacts with Tangata Whenua values.* When this is the case, the applicant should engage with Tangata Whenua to avoid the impacts and work on a better solution for Tangata Whenua.

It is somewhat discouraging to see the parts that are related to taiaio are deleted, such as retaining landforms and relationship with open spaces. How are these gaps are going to be filled, we are unclear.

### **Policy UFD-P4 Residential Density:**

We are concerned that the Residential Density policy went up a nudge to be able to cater for ‘high densities’ in specified zones but Clause 5 is mostly deleted and recrafted to say the residential densities will be integrated with existing or planned infrastructure capacity.

This is allowing higher densities, potentially in the absence of these infrastructure being provided or available. Since ‘infrastructure’ is not a qualifying matter, this is a big concern for Tangata Whenua.

### **Policy UFD-P11 Amenity Values:**

We are concerned and oppose the clause 2 that reinserted *‘considers effects on the amenity values of those areas while recognising that the district’s urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities and future generations’.*

The insert of the latter sentence is an excuse of unsubstantiated nature to acknowledge the change across the city, but it is recrafted to mean amenity might not be provided for.



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### **Policy UFD-P13 Zoning Framework:**

We see it problematic that the Zoning Framework may not respond to Tangata Whenua needs as Residential Intensification is listed above as a qualifying matter. This matter becomes more problematic when we consider the unforeseen impacts of the residential intensification on Sites and Areas of Significance and Tangata Whenua Resource Management.

One solution that may be proposed to address this is to add a new sentence to the Policy, *all residential intensification should be assessed from a cultural perspective*. When in doubt, necessary kōrero should take place with members of iwi and hāpu.

### **Proposed new Papakāinga Chapter:**

Tangata Whenua were heavily involved in the drafting the papakāinga provisions. We support the chapter as a whole and that it is enabled in different zones. We do however ask papakāinga being enabled in the Metropolitan City Zone as mentioned above.

### **Proposed Amendments to the General Residential Zone:**

The Rūnanga is concerned that General Residential Zone leaves appearance and amenity of neighbourhood changes to Design Guides which are expected to manage the impacts of medium density and high-density developments.

We are not convinced a non-binding document that developers can push back on because they might want to cut off their costs could achieve a high standard of urban design and just to *'encourage'* new development *'contribute'* positively to the changing character of the zone.

### **Residential Precinct A:**

We are concerned, simple following of rapid transit stops definition, created a zoning which may not be appropriate in the implementation. This becomes a bigger concern because of climate change and serious lack of infrastructure in Kāpiti Coast.

For instance, it is puzzling to see Paekākāriki being in the same up zoning category with Paraparaumu and Waikanae but not Ōtaki. A similar case study that can be referred to, pointing out to this confusion and arbitrariness across the region for calculating rapid transit stop is Whanganui-a-Tara Johnsonville Catchment. The JVL line did not pass for a rapid transit stop to enable high densities and was left out in the relevant zoning.

Similarly, in some parts of Auckland, the lack of infrastructure was regarded as a qualifying matter. The inconsistency and intention of these zoning calculations suggest they might have not been investigated in practical sense, as they are literal interpretations of NPS-UD but somehow do not match the intention of the NPS-UD.

The coastal qualifying matter precinct is another example: whilst the coastal areas are specified to be exempted from proposed level of density and intensification, it is not referring





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to any aspect of Climate change which will make this zone a continued no-go area, not just 'until' a future coastal environmental plan change is done. It does also avoid talking about this zone honestly to public, that there are uncertainties involve regarding climate change.

It is imperative to highlight that the deleted sections refer to high character values in specific precincts are all put into intensification categories in the newer version. This is concerning not necessarily about giving effect to intensification but the way in which suddenly their value is diminished in the face of plan change.

#### **Five new policies Medium Density Residential Standards:**

Given that all five policies are incorporated to give effect to Medium Density Residential Standards and a central government requirement, we consider in general, these policies are seeking objectives that are not well considered and may align poorly in practice.

We are particularly concerned about the Policy and its drafting intent which states: *Apply the MDRS across all relevant residential zones in the District Plan except in circumstances where a qualifying matter is relevant (including matters of significance such as historic heritage and the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga).*

We oppose the wording of 'relevant' in the drafting of GRZ-PX2 as these dilute the wording of the sites of significance when it applies that MDRS should no place in the SASMs and their adjacent sites. Who is to decide the relevancy when processing such resource consents?

GRZ-PX5 is conflictual in the sense that it encourages us to accept a scenario that does not add up to permitted activity and as soon as it is encouraging high quality development that it can pass the test. We might be blindly accepting an activity that is not permitted and is restricted discretionary otherwise.

It is encouraging to see where there can be high and medium densities, streets are safe and attractive, there are adequate open spaces, and the developments meet the needs of residents' daily needs. We are not sure or assured how these are delivered through the standards and methods. The policies should highlight and refer to the methods that could achieve that, and they will be considered by the resource consent planners.

#### **New policy GRZ-Px6 Residential Intensification Precincts:**

Since we are unsure the scale and scope of the precincts (and their impacts on our sites of significance), we do not support providing for higher densification in these areas in a blanket way but support with amendments. Since these areas have been identified in a quick manner with limited research and impact analysis for Tangata Whenua and because the Residential Design Guide does not reflect Tangata Whenua values at this point in time, we do not have any confidence Policy GRZ-Px6 will deliver how spaces and places look and feel.



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### **Coastal Qualifying Matter District:**

Coastal qualifying matter district should be redrafted to reflect the Climate Change and sea level rise and the chapter to be recrafted to strengthen the fact that why less development is needed in this District. There is a sentiment in the drafting intention, that in the future, a formulated environment plan could change the nature of how this precinct is defined and may even be removed as an overlay.

It is astonishing to see 4.16 GRZ-R6 rule is being the permitted activity; the standards attached to this rule are permissive in terms of the maximum number of residential units. This does not seem to encourage less buildings and structures but seems to introduce more complexity in the coastal qualifying matter district.

This allows up to four residential units may be erected on-site provided that it can meet the standards of containment, separation by distance, permitted activity standards, and provided that financial contributions were made.

### **Proposed amendments to the Metropolitan City Zone:**

This zone does not mention the structure plan will be developed with Tangata Whenua to ensure if any resource management issues arise with the development of twelve storey buildings.

### **Proposed amendments to the Town Centre Zone:**

#### **Text added to Coastal Qualifying Matter Precinct**

As mentioned above, coastal qualifying matter precinct is defined as a precinct where the coastal hazards can be addressed through a future coastal environmental plan change and suggests in an indirect way that the development may be available through this Plan Change.

The text should recognise Climate Change aspect of the coastal hazards and the language in the text should be strengthened to say: 'The purpose of this precinct is to identify the area within which the level of development required under the NPS UD policy 3 will not be enabled due to serious coastal hazards risks posed in this precinct that will be worsened by the climate change. The future of development and or the management of present development in this precinct will be worked through with public and Mana Whenua through a future plan change as to not to encourage further and / or more development in this precinct.'

### **Proposed amendments to the Local Centre Zone Chapter:**

#### **Amendments to Zone introduction**

See the suggestion around 'Coastal Qualifying Matter Precinct'. We suggest the same approach to be followed in the Local Centre Zone.



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#### **Amend Policy LCZ-P1 Local Centres:**

We have made comments above the rationale behind Paekākāriki being part of the medium density and intensification zoning as per the Local Centre provisions. In this regard, Paekākāriki is removed from its own Village Design Guide to accommodate the changes made to its zoning. We find this concerning, especially in regard to how the differences between different centres will be managed from a design perspective.

By removing a certain design guide as it became irrelevant in the face of up-zoning, it is unclear whether the design guide that will be used and being replaced with Village Design Guide, is able to safeguard the existing values we would like to be able to keep in Paekākāriki.

We would like to question, if there was not any need for these design guides, does that mean we won't be able to now protect these values in the proposed system.

#### **Amend Policy LCZ-P3 Activities in Working Zones:**

In line with our earlier comments, it is somewhat astonishing that identity and character values under LCZ-P3, are only 'considered' instead of assessed in a balancing manner in development proposals.

Clause 5 is following an approach on the built form instead of keeping the natural form as much as we can. Working zones do not have to look like working zones and they can be blended with and work with Taiaio.

#### **LCZ-P6 Urban Form and Design of Centres:**

We suggest the wording of LCZ-P6 to be strengthened to include Tangata Whenua involvement in Urban Form and Design of Centres.

Our suggested wording is: *To achieve this, Centres Design Guide will be applied with co-design input from Tangata Whenua, specifically if the higher density proposals in Metropolitan and Town Centre zones and heights proposed at twelve Storeys.*

#### **TCZ-Px1 Coastal qualifying matter precinct in Raumati South:**

We consider that it is at odds that the Council aims to somewhat restrict the development in coastal qualifying matter district as per coastal erosion reasons; but here by adding a new policy, TCZ-Px1, that says 'an urban built form not exceeding three-storeys is anticipated'. We do seek clarification as to the inconsistent messaging that this policy creates especially when we know that coastal qualifying matter precinct is crafted to not to enable the level of development required by the NPS-UD.



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### GRZ-R8

It is restricting for Tangata Whenua if the papakāinga is located on Kāpiti Island must comply with the standards with GRUZ-6. We do seek amendment of this rule to enable Tangata Whenua and Tino Rangatiratanga.

### Amendments to the Financial Contributions Chapter:

#### Introduction text

We suggest the introduction text should include Tangata Whenua's decision-making involvement in the identification of financial contributions. We suggest this Chapter to be rewritten the section to say:

*Financial contributions under this Plan may be required in respect of avoiding and remedying, ~~mitigating, or offsetting~~ any adverse environmental effects that is (only like for like) on any or all of the following:*

- *Sites and areas of significance to iwi and Māori including awa, moana, motu, ngahere*

*In places of significance to iwi and Māori the contributions, amount, and form of the contributions should be discussed with Tangata Whenua, kaitiakitanga of the whenua, and if needed, transferring of these powers to iwi.*

As per the same topic, we are somewhat concerned as to understanding how council will measure and judge the same development proposal, if it might impose further unassessed negative impacts that was not the subject before?

The Rūnanga does not agree that offsetting should be included in this section. If an activity's impacts require offsetting, this usually means the environmental or cultural value will be lost. We oppose that activity to occur in the first place.

In addition to the above suggestions for Chapter to be strengthened; we suggest a practice note to be crafted to say: *Tangata Whenua will be involved in these decisions as the kaitiakitanga of the whenua.*

### FC-P3 Financial contributions to offset or compensate for adverse effects:

As briefly mentioned above, we oppose this policy that it covers a situation when the damage is already done. The contributions should be directed to avoiding these activities in the first place and mitigate if there were any need after that. This should be rewritten to say: *A financial contribution may be required for any land use or subdivision application to ensure positive effects on the environment are achieved to mitigate and avoid the adverse effects on the environment.*



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### **FC-R5 General requirements for payment of a financial contribution:**

Clause 1 only refers to land and money and this may be limiting if we consider Tangata Whenua in the decision making of financial contributions. Clause 2 is restricting the further decisions that may need to be made if certain aspects of the proposed development and its impacts have not been well estimated and or assessed into the project implementation stage.

FC-F5 should have additional phrases to include Tangata Whenua's principles and roles, as rangatiratanga (decision-maker) and kaitiakitanga along with the Council partners. Depending on the location and nature of the proposal, Tangata Whenua would want to get involved determining the land and the amount regarding the contributions. The land always should be able to be offered to Tangata Whenua.

### **Offsetting and compensation effects:**

We oppose and suggest this to be deleted. This clause means that Tangata Whenua accepts the degradation of mauri.

### **Other proposed consequential or supporting amendments:**

#### **CF-Px Community Facilities as part of Papakāinga**

We find the purpose of the new policy unclear. We suggest this to be redrafted to make sure the wording is clear and that we are not meaning to invite all members of community to Papakāinga facilities. The wording should spell out the purpose of the policy which is meant for the facilities *established for Tangata Whenua* use only.

### **Proposed amendments to the District Plan Schedules:**

We support the amendments to the Schedule 9 Sites and Areas Significant to Māori and adding of Kārewarewa Urupā (Waikanae Beach) to the Schedule. However, it is important to add that there will be a policy gap of introducing intensification and medium density rules in the Plan, in the absence of including a new review of the Schedule of Sites and Areas of Significance to iwi and Māori in Kāpiti. We are concerned additional sites and their new spatial scope may not be provided protection at the level that Tangata Whenua desires.

### **Qualifying matter area to the definitions chapter:**

Since qualifying matter is defined under a list in this particular section, we are concerned to see, the listed items may be interpreted as they are put in order of importance. It might be worthwhile to add an explanatory note to state that they are in random order. If indeed they



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are not, it is far from ideal that SASM schedule is down at the bottom of the list. Rūnanga opposes a Tangata Whenua matter can be put in order of importance by Council.

I wish to be heard in support of my submission.

Ngā Mihi,

Naomi Solomon

Pou Toa Matarau

Te Rūnanga o Toa Rangatira



**From:** [Onur Oktem Lewis](#)  
**To:** [Mailbox - District Planning](#); [Jason Holland](#)  
**Cc:** [Moana Solomon](#); [Jaida Howard](#); [^Naomi Solomon](#)  
**Subject:** KCDC Intensification Plan Change 2 submission attached  
**Date:** Monday, 19 September 2022 4:28:00 pm  
**Attachments:** [image001.png](#)  
[KCDC housing plan change Submission Ngāti Toa 19 09 2022 - Copy.pdf](#)

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Kia ora Jason,

Please see our Plan Change 2: Intensification submission attached. If any problems opening the file or any other pātai, please let us know.

Ngā mihi nui

Onur



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